

National Aeronautics and Space Administration



**Ames Research Center**  
Moffett Field, California 94035

April 8, 2022

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Attn: Mr. Mark Beason

Subject: Section 106 Consultation for the Manila Avenue Bicycle Path Project, Santa Clara County, CA

Dear Ms. Polanco,

The National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) requests Section 106 consultation on the Manila Avenue Bicycle Path Project (project or undertaking) at ARC, Moffett Field, Santa Clara County, California. Google proposes to improve the existing bike and pedestrian path between Ellis Street near the Santa Clara Valley Transportation Authority (VTA) Bayshore/NASA Station and Enterprise Way at Moffett Park. The project extends through ARC, which requires permit approval from NASA ARC. Therefore, NASA ARC has determined that this project constitutes an undertaking under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code 306108), as amended. In support of its responsibilities under Section 106, NASA ARC is providing, for your review, a description of the undertaking, the Area of Potential Effects (APE), identification efforts, a description of the affected historic properties, and an assessment of potential effects resulting from the undertaking.

#### *Project Location*

The project area is located along Manila Avenue at the southern boundary of ARC, just north of U.S. Highway 101, and west of the U.S. Highway 101–State Route 237 interchange (see Figure 1 in enclosed report). The proposed bike and pedestrian path would extend along the northern side of Manila Avenue between Ellis Street and Enterprise Way. Portions of the project are located in the NASA ARC property and right-of-way (ROW) and within the City of Mountain View, City of Sunnyvale, and an unincorporated section of the County of Santa Clara.

#### *Description of the Undertaking*

The proposed undertaking will improve the existing bike path between Ellis Street and Enterprise Way (Photographs 1 through 3). The proposed pathway would be a 12-foot to 16-foot-wide mixed use (bicycle and pedestrian) pathway. The project would install new drainage facilities and landscaping within a portion of undeveloped right-of-way area on the northeast corner of the Manila Avenue/Enterprise Way intersection. Other improvements along Manila Avenue would include curb and gutter improvements; storm drain improvements; signing and striping improvements, pedestrian lighting improvements, and

traffic signal improvements at the intersection of Manila Avenue/Enterprise Way. The majority of the pavement rehabilitation and sidewalk improvements would not disturb more than 6 inches of native soil. Lighting improvements would require up to 6 feet of disturbance below grade, and traffic signal improvements will require disturbance of 7.5 to 12 feet below grade. Other utility work will require disturbance between 2 to 5 feet below grade.



Photograph 1. Northwest corner of Manila Avenue/Enterprise Way intersection showing traffic signal, existing sidewalk, and existing bike and pedestrian path (left), view facing west.



Photograph 2. Existing bike and pedestrian path along Manila Avenue, view facing west.



Photograph 3. Existing bike and pedestrian path at VTA Bayshore/NASA Station, view facing west.

#### *Area of Potential Effects*

The APE is defined to address both direct and indirect potential effects on historic properties. Due to the nature of the project, no potential temporary or permanent visual, audible, or atmospheric effects are anticipated. Therefore, the APE is limited to the extent of the project footprint and includes all areas of potential ground disturbance (see Figure 1 in enclosed report). The vertical APE extends 6 inches below grade along the majority of the pathway improvements; 6 feet below grade at lighting improvements; 7.5-12 feet at traffic signal improvements; and between 2 and 5 feet below grade for utility work.

#### *Identification Efforts*

##### Built Environment Resources

The APE is adjacent to the expanded district boundary of the U.S. Naval Air Station (NAS) Sunnyvale Historic District, which is listed in the National Register of Historic Places (NRHP) (NRHP #94000045) but does not extend into the district. Due to the nature of the project, no effects on built environment resources are anticipated as a result of this project.

##### Archaeological Resources

Google retained Archaeological/Historical Consultants (A/HC) to conduct a cultural resources study for this project. A/HC prepared the *Cultural Resources Inventory Report for Manila Avenue Bicycle Path Project* dated March 2022 (enclosed). The study was conducted by cultural resources professionals who meet the Secretary of the Interior's Professional Qualifications Standards in archaeology.

The cultural resources study conducted a records search at the Northwest Information Center in April 2019. The entire project area had been previously surveyed, and two prehistoric sites were previously recorded in the APE: CA-SCL-12/H (P-43-000032) and CA-SCL-20 (P-43-000040) (see Figure 2 in enclosed report).

Site CA-SCL-12/H, “Little Ynigo Mound,” consists of midden deposit, human burials, and widely dispersed cultural material. It was first recorded in 1912, and further investigated in 1947, 1987, 1995, and 2008. In 1990 the site was determined eligible for the NRHP through a consensus determination.

Site CA-SCL-20, “Big Ynigo Mound,” was a large occupation site and earth mound nearly totally destroyed by the time it was first recorded in 1912, prior to being leveled for the construction of Moffett Field in the 1930s-40s. Efforts to locate the site occurred in 1987, 1991, and 2014 but found no evidence of surficial or buried archaeological deposits, including directly within and adjacent to the current APE. In 1991, fourteen backhoe trenches were dug parallel to and between Manila Road and Macon Road, directly adjacent to the current APE, in the mapped location of CA-SCL-20. No cultural material was identified in any of the trenches. These prior investigations adequately demonstrated that there is no evidence for the presence of CA-SCL-20 south of Moffett Field, and SHPO concurred with findings of no adverse effects to the site for numerous prior undertakings within the US101/Manila Drive/Macon Road corridor.

A/H/C conducted pedestrian survey of the APE on April 10, 2019. No evidence of cultural resources was observed. A/H/C also conducted hand auger testing in April 2019 and mechanical auger testing in February 2022 to determine the presence or absence of archaeological deposits associated with CA-SCL-12/H (see Figure 7 in enclosed report). Hand auger testing consisted of eight 4-inch diameter augers to a depth of 200 centimeters (cm) or more, and one to 155 cm; the two mechanical auger units reached 290 cm. Fill soils were identified to depths of approximately 100cm below surface, overlying the native land surface. No artifacts, midden soils, or other potentially significant archaeological deposits were found (see enclosed technical report for further details).

The study concluded that CA-SCL-12/H does not extend into the project APE.

#### *Affected Historic Properties*

Site CA-SCL-12/H is eligible for the NRHP. Archaeological testing for the current project was completed within the project APE in and near the mapped boundary of CA-SCL-12/H in 2019 and 2022 but did not identify cultural resources. This negative finding is corroborated by prior trenching efforts (AECOM 2018), which took place on the west side of the Manila Ave/Enterprise Way intersection and were submitted to and concurred on by SHPO. It appears likely that the project lies outside of CA-SCL-12/H, and that the western boundary of the site is incorrectly mapped in this specific location. Prior archaeological investigations indicate that the center of the site is around the west side of the southbound SR-237 onramp. An augering program by Caltrans (2009) discovered areas of intact shell midden extending eastward along Manila Avenue from about 50 feet east of Enterprise Way. Augers placed within and adjacent to the current APE, however, revealed no cultural resources. However, midden deposits within CA-SCL-12/H are discontinuous and it is possible that unknown resources are present.

#### *Effects Assessment*

Within and near the previously recorded eastern boundary of CA-SCL-12/H, at Enterprise Way, the project excavation activities will include:

- Sidewalk and pavement improvements/restoration up to 1 foot below grade
- Electrical and utility conduit installation up to 30 inches below grade
- Traffic signal pole foundations; first location up to 7.5 feet below grade, second location up to 12 feet below grade following Caltrans requirements
- Light pole foundation up to 6 feet deep

See Figure 7 in enclosed report for the location of these project activities. Based on the testing effort described above, the pavement and utility excavations will be confined to the upper fill prism, while the traffic signal and light pole foundations will extend into the underlying native landform.



Testing within and near the boundary of the site did not identify cultural resources within the project APE. Although efforts have been undertaken to identify archaeological resources within the APE with negative results, the potential for encountering unanticipated archaeological resources during construction can never be completely ruled out. To minimize potential effects on previously unknown cultural resources, NASA will require that a qualified archaeologist and Native American monitor be present during ground-disturbing activity during construction. Prior to ground-disturbing activities, the archaeological and Native American monitors will provide an awareness training to construction crews to alert them to the archaeological sensitivity of the project area and protocol to follow in the event of an inadvertent discovery during construction.

This project also extends within the City of Mountain View, City of Sunnyvale, and an unincorporated section of the County of Santa Clara. The project has been reviewed in compliance with the California Environmental Quality Act (CEQA) and granted a categorical exemption under CEQA with Standard Environmental Conditions for the discovery of unanticipated archaeological resources and human remains by the County. The following conditions for the discovery of archaeological resources and human remains will be followed for this Section 106 undertaking:

1. **DISCOVERY OF ARCHAEOLOGICAL RESOURCES:** If prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, all work within 100' of the find be halted until a qualified archaeologist and Native American representative can assess the significance of the find. Prehistoric materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative and NASA, will develop a treatment plan that could include site avoidance, capping, or data recovery. NASA, and the project proponent, may have additional Section 106 consultation responsibilities, in the event of an unanticipated significant archaeological discovery.
2. **DISCOVERY OF HUMAN REMAINS:** In the event of the discovery of human remains during construction or demolition, there shall be no further excavation or disturbance of the site within a 50' radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his/her authority, he/she shall notify the Native American Heritage Commission, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.
3. **REPORTING.** A final report shall be submitted to the NASA ARC Cultural Resources Manager. This report shall contain a description of the results of the monitoring effort, and any additional studies undertaken to assess identified resources, and a description of the disposition/curation of the resources. The report shall verify completion of the monitoring program.

With the exception of the potential to affect unknown subsurface archaeological resources, the project is not anticipated to have any direct effects on historic properties.

#### *Determination of Effect*

Based on the assessment conducted by qualified cultural resources professionals, NASA ARC has made a finding that the undertaking would result in No Adverse Effect to historic properties, pursuant to 36 Code of Federal Regulations (CFR) 800.5(b).

### *Consultation Efforts*

As previously mentioned, the City of Mountain View, City of Sunnyvale, and County of Santa Clara have reviewed this project under CEQA requirements, with City of Sunnyvale as the lead State agency. Currently, these entities are not consulting parties to this Section 106 consultation.

No Federally Recognized Tribes are associated with the geographical boundaries of NASA ARC or this undertaking. In July 2021, a Sacred Lands File search and a list of Native American tribes and representatives with a known interest in the area was requested from the Native American Heritage Commission (NAHC). The NAHC responded on July 28, 2021, indicating that the Sacred Lands File search was negative and providing a list of non-federally recognized Native American representatives who may have additional information regarding cultural resources in the vicinity of the ARC property. The 10 Native American tribes and individuals on the NAHC list were notified by U.S. Postal Service mail and email on March 3, 2022, of the proposed project, the results of the records search and subsurface testing investigations, and the proposed finding of effect. Follow-up calls were made on March 30, 2022. The following responses were received:

- Quirina Geary of the Tamien Nation transmitted a request for consultation under CEQA by email on March 30, 2022.
- Irene Zwierlein of the Amah Mutsun Tribal Band of San Juan Bautista was reached by phone on March 30, 2022. She recommended that construction crews receive training in recognition of Native American cultural resources. She also recommended that a qualified archaeologist and Native American should be contacted in the event of inadvertent discoveries.

Voicemail messages were left for the other eight individuals and tribes on the NAHC list. No additional replies have been received as April 4, 2022. See enclosed Native American Notification Log and Correspondence for additional details.

NASA ARC is conducting additional outreach with the Tamien Nation to solicit specific concerns that the tribe may have about the project. Tamien Nation's request for consultation was specific to CEQA, which is the purview of the City of Sunnyvale as the lead state agency that permitted the project under a CEQA categorical exemption (Class 1, Section 15301(c): "Existing Facilities"). NASA ARC will recommend that the Tamien Nation send their request and concerns directly to the CEQA lead agency.

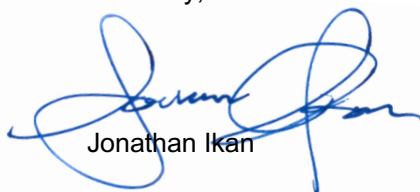
The recommendations of the Amah Mutsun Tribal Band of San Juan Bautista, for archaeological and Native American assessment of inadvertent discoveries, is addressed through the minimization measures described above. If an inadvertent discovery of prehistoric archaeological resources is encountered, NASA ARC will consult with the on-site Native American monitor.

NASA ARC has not identified additional consulting parties for this Section 106 review but is making a redacted version of these findings available to the public via the NASA ARC Historic Preservation Office website (<https://historicproperties.arc.nasa.gov/section106.html>).

NASA ARC requests the SHPO's concurrence on NASA ARC's finding of No Adverse Effect for this undertaking pursuant to 36 CFR 800.5(b). Please provide a response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

Please contact me at [jonathan.d.ikan@nasa.gov](mailto:jonathan.d.ikan@nasa.gov) or at (650) 604-6859 with your comments or questions.

Sincerely,



Jonathan Ikan

Cultural Resource Manager, Facilities Engineering Branch  
NASA Ames Research Center, Mail Stop 213-8  
Moffett Field, CA 94035  
(605) 604-6859  
[Jonathan.d.ikan@nasa.gov](mailto:Jonathan.d.ikan@nasa.gov)

*Enclosures (Confidential)*

Archaeological/Historical Consultants. *Cultural Resources Inventory Report for Manila Avenue Bicycle Connector Project* dated March 2022 (Confidential)

Native American Notification Log and Correspondence for Manila Avenue Bicycle Path Project  
(Confidential)